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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION, THIS DOCUMENT RELATES TO: *Epic Games, Inc. v. Google LLC et al.*, Case No. 3:20-cv-05671-JD *In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD *State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD *Match Group, LLC et al. v. Google LLC et al.*, Case No. 3:22-cv-02746-JD	Case No. 3:21-md-02981-JD **[PROPOSED] ORDER RE: JOINT OMNIBUS ADMINISTRATIVE MOTION TO FILE UNDER SEAL MATERIAL SUBMITTED IN CONNECTION WITH THE BRIEFING ON PLAINTIFFS' MOTION FOR SANCTIONS** Judge: Hon. James Donato

Having considered the Parties' Joint Omnibus Motion to File Under Seal certain limited

portions of the parties' joint proffer (Dkt. No. 257), Plaintiffs' Motion for Sanctions (Dkt. No.

349), and Plaintiffs' Reply (Dkt. No. 372), and supporting exhibits, as well as the party

declarations submitted in support of this administrative motion and any materials submitted in

support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5;

IT IS HEREBY ORDERED:

The following portions of parties' papers related to Plaintiffs' motion for sanctions and

supporting documents may be filed under seal:

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Joint Proffer & Supporting Exhibits			
Exhibit A – Joint Proffer	**Page 5:13-16 (between "Platforms & Ecosystems) that" and "Exs. 13-25")**	Google (Cramer Decl. ¶ 1)	
Exhibit A1 – Joint Proffer Exhibit 6 [Dkt. No. 257-07]	**Page 126, Lines 12-16 (between "on June 7th about" and "and the Play Store")**	Google (Cramer Decl. ¶ 2)	
Exhibit A1 – Joint Proffer Exhibit 6 [Dkt. No. 257-07]	**Page 128, lines 8-10 (between "Play Store that" and "rev share on the Play Store"), and lines 20-21 (between "chat yesterday that" and "on the Play Store")**	Google (Cramer Decl. ¶ 3)	
Exhibit A1 – Joint Proffer Exhibit 6 [Dkt. No. 257-07]	**Page 129, lines 17-23 (between "says that" and end of sentence; between "that means that" and "in return for"; and between "in return for" and "is that what that means?")**	Google (Cramer Decl. ¶ 4)	
Exhibit A2 – Joint Proffer – Exhibit 8 [Dkt. No. 257-09]	**Page 396 (between "Do you know who" and "is"; between "is?" and "is an executive at"; between "is an executive at" and "in their mobile division."; between "messaged over Google Chats with" and "A. Yes."; and between "believe it is in a conversation you had with" and "and in this message it says")**	Google (Cramer Decl. ¶ 5)	
Exhibit A3 –	**Page 369, Line 7 (between "discussing your relationship**	Google (Cramer Decl. ¶ 6)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Joint Proffer – Exhibit 9 [Dkt. No. 257-10]	and discussions with" and "correct?")		
Exhibit A4 – Joint Proffer – Exhibit 11 [Dkt. No. 257-12]	Page 1 (between "Liderman [" and "]"; and between "Kleidermacher [" and "]")	Google (Cramer Decl. ¶ 7)	
Exhibit A4 – Joint Proffer – Exhibit 11 [Dkt. No. 257-12]	Page 1 (between "been considered" and "Eugene Liderman, 2020-09-29 08:04:23"; between "08:08:07" and "should we continue"; between "off-play risk has" and "Dave Kleidermacher, 2020-09-29 08:09:35"; and between "with an MTD represent" and "of all AE devices")	Google (Cramer Decl. ¶ 8)	
Exhibit A4 – Joint Proffer – Exhibit 11 [Dkt. No. 257-12]	Page 2 (between "malware rates" and "could help sway"; and between "going to say that" and "Eugene Liderman")	Google (Cramer Decl. ¶ 9)	
Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1 (between "Wojcicki[" and "]"; and between "Lockheimer [" and "]")	Google (Cramer Decl. ¶ 10)	
Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1, (between "process was subverted" and "Susan Wojcicki, 2020-06-22 17:48:01"; and between "2020-06-22 17:48:46" and "Susan Wojcicki, 2020-06-22 17:55:52)	Google (Cramer Decl. ¶ 11)	
Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1 (between "who I did say I would get back to" and "I emailed him saying")	Google (Cramer Decl. ¶ 12)	
Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 1 (between "2020-06-22 21:10:32" and end of page)	Google (Cramer Decl. ¶ 13)	
Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 2 (between "allowed to take off 2 days" and "Susan Wojcicki, 2020-06-22 21 :11 :37"; and between "when did anyone say Scott can't" and "Susan Wojcicki, 2020-06-22 21 :11 : 55")	Google (Cramer Decl. ¶ 14)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit A5 – Joint Proffer – Exhibit 12 [Dkt. No. 257-13]	Page 3 (between "you and I never met and" and "Susan Wojcicki, 2020-06-22 21:14:55," between "what may be lost here" and "Susan Wojcicki, 2020-06-22 21:15:09"; between "do with our HC" and " Susan Wojcicki, 2020-06-22 21:21:11"; between "BTW" and "I'm fully aware of that"; between "keep in mind" and " Anyway, let's discuss"; and between "I understand if" and "Susan Wojcicki, 2020-06-22 21:24:20")	Google (Cramer Decl. ¶ 15)	
Exhibit A6 – Joint Proffer – Exhibit 13 [Dkt. No. 257-14]	Page 1 (between "Borchers[" and "]"; and between "Rosenberg [" and "]")	Google (Cramer Decl. ¶ 16)	
Exhibit A7 – Joint Proffer – Exhibit 14 [Dkt. No. 257-15]	Page 1 (between "Lim [" and "]"; and between "Kochikar[" and end of "To:" list)	Google (Cramer Decl. ¶ 17)	
Exhibit A7 – Joint Proffer – Exhibit 14 [Dkt. No. 257-15]	Page 1 (between "reflect the" and "convo we just had"; between "engage with" and " "; between "to your proposal" and "for reference, I think this"; between "made it unclear if" and " " between "what this means for" and end of sentence; and between "the intent is that" and end of sentence; between "4." and end of sentence)	Google (Cramer Decl. ¶ 18)	
Exhibit A7 – Joint Proffer – Exhibit 14 [Dkt. No. 257-15]	Page 1 (between "lgtm. With one caveat" and end of following sentence).	Google (Cramer Decl. ¶ 19)	
Exhibit A8 – Joint Proffer – Exhibit 15 [Dkt. No. 257-16]	Page 1 (between "Gambhir[" and "]"; and between "Marchak [" and end of "To:" line)	Google (Cramer Decl. ¶ 20)	
Exhibit A9 – Joint Proffer – Exhibit 16 [Dkt. No. 257-17]	Page 1 (between "Kolotouros[" and "]"; and between "Kan[" and end of "To:" line)	Google (Cramer Decl. ¶ 21)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit A10 – Joint Proffer – Exhibit 17 [Dkt. No. 257-18]	Page 1 (between "Kim [" and "]"; and between "Pimplapure [" and end of "To:" line)	Google (Cramer Decl. ¶ 22)	
Exhibit A11 – Joint Proffer – Exhibit 18 [Dkt. No. 257-19]	Page 1 (between "Herring[" and "]"; and between "Porat [" and end of "To:" line)	Google (Cramer Decl. ¶ 23)	
Exhibit A11 – Joint Proffer – Exhibit 18 [Dkt. No. 257-19]	Page 1 (between 11:06:49 and end of message; between 11:07:50 and "Ruth Porat, 2019-06-20 11:12:49"; and between "materializing" and "Ruth Porat, 2019-06-20 11:15:00")	Google (Cramer Decl. ¶ 24)	
Exhibit A12 – Joint Proffer – Exhibit 19 [Dkt. No. 257-20]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	Google (Cramer Decl. ¶ 25)	
Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	Google (Cramer Decl. ¶ 26)	
Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 1 (between "2020-06-18T18:17:14.646Z" and "has reduced their"; between "marketing of the" and "limiting it"; between "if we think" and "would go bigger"; and between "exploring with them if" and "is interested")	Google (Cramer Decl. ¶ 27)	
Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 2 (between "is mostly about" and "2020-06-18T18:35:54.625Z"; "OK to leave" and "out of the agreement")	Google (Cramer Decl. ¶ 28)	
Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	Page 2 (between "why is this just an issue for" and "2020-06-18T18:55:28.961Z"; between "FWIW" and "is also substantially"; "2020-06-18T18:58:08.881Z" and "solution has revenue"; and between "2020-06-18T19:15:07.155Z" and "2020-06-18T19:19:27.459Z")	Google (Cramer Decl. ¶ 29)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	**Page 3 (between "we can partner. Since" and "we've floated 3"; between "joint meeting with" and "but we've landed nowhere"; between "differentiation to" and "is going to be"; between "coming in asking for" and "2020-06-18T20:12:57.887Z"; and between "100 people to go to" and "2020-06-18T21:48:38.739Z")**	Google (Cramer Decl. ¶ 30)	
Exhibit A13 – Joint Proffer – Exhibit 20 [Dkt. No. 257-21]	**Page 4 (between "how much influence" and "has on the decisionmaking"; between "challenge esp with" and "it is not an equal playing field"; between "support provided by" and "This combined"; and between "leading to a" and "I will ping you").**	Google (Cramer Decl. ¶ 31)	
Exhibit A14 – Joint Proffer – Exhibit 21 [Dkt. No. 257-22]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)**	Google (Cramer Decl. ¶ 32)	
Exhibit A15 – Joint Proffer – Exhibit 22 [Dkt. No. 257-23]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)**	Google (Cramer Decl. ¶ 33)	
Exhibit A16 – Joint Proffer – Exhibit 23 [Dkt. No. 257-24]	**Page 1 (between "Chu [" and "]"; and between "Gupta [" and end of "To:" line)**	Google (Cramer Decl. ¶ 34)	
Exhibit A16 – Joint Proffer – Exhibit 23 [Dkt. No. 257-24]	**Page 2 (between "this is all about" and "They could have"; between "same category as" and "They worry"; between "that if they" and "Eric Chu, 2020-05-28 11:57:19"; between "protecting" and Prachi Gupta, 2020-05-28 11:58:18"; between "regarding" and "i don't see"; and between "world where we" to "Eric Chu, 2020-05-28 12: 05: 22")**	Google (Cramer Decl. ¶ 35)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit A17 – Joint Proffer – Exhibit 24 [Dkt. No. 257-25]	Page 1 (between "Kolotouros [" and "]"; and between "Indonie [" and end of "To:" line)	Google (Cramer Decl. ¶ 36)	
Exhibit A18 – Joint Proffer – Exhibit 25 [Dkt. No. 257-26]	Page 1 (between "Lee [" and "]"; and between "To:" and end of "To:" line)	Google (Cramer Decl. ¶ 37)	
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 4, fourth section (between beginning of bolded header and "Contracts"; between "agreements between" and ", because the individuals"; between "responsible for negotiating the" and "are custodians in either"; between "relating to" and "agreements that were collected"; and between "agreements between" and ". Google also reserves")	Google (Cramer Decl. ¶ 38)	
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 4, heading 5 (from beginning of heading to "Agreement").	Google (Cramer Decl. ¶ 39)	
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 5 (from "example of an email referencing a" to "NDA")	Google (Cramer Decl. ¶ 40)	
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 6, para. 4 (between "signing party for" and "agreements is"; between "agreements is" and end of sentence; and between "has been produced for" and end of sentence)	Google (Cramer Decl. ¶ 41)	
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Page 7, paragraph 1 (between "(1)" and "(GOOG-"; between "(2)" and "(GOOG-"; between "(3)" and "(GOOG-"; and between "(4)" and "(GOOG-")	Google (Cramer Decl. ¶ 42)	
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	Ex. C, Entire Table	Google (Cramer Decl. ¶ 43)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit A19 – Joint Proffer – Exhibit 30 [Dkt. No. 257-30]	**Ex. D, Entire Table**	Google (Cramer Decl. ¶ 44)	
Exhibit A20 – Joint Proffer – Exhibit 31 [Dkt. No. 257-31]	**Page 1 (between "Herring ["** and **"]"; and between "Cramer [" and "]")**	Google (Cramer Decl. ¶ 45)	
Exhibit A20 – Joint Proffer – Exhibit 31 [Dkt. No. 257-31]	**Page 1 (between "in Q2 alone" and "see earnings prep")**	Google (Cramer Decl. ¶ 46)	
Exhibit A21 – Joint Proffer – Exhibit 32 [Dkt. No. 257-32]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)**	Google (Cramer Decl. ¶ 47)	
Exhibit A21 – Joint Proffer – Exhibit 32 [Dkt. No. 257-32]	**Page 1 (between "is about" and "https:screenshot"; between "we do about" and "disables"; and between "disables and" and "warnings depending).**	Google (Cramer Decl. ¶ 48)	
Exhibit A22 – Joint Proffer – Exhibit 33 [Dkt. No. 257-33]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)**	Google (Cramer Decl. ¶ 49)	
Exhibit A23 – Joint Proffer – Exhibit 34 [Dkt. No. 257-34]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)**	Google (Cramer Decl. ¶ 50)	
Exhibit A23 – Joint Proffer – Exhibit 34 [Dkt. No. 257-34]	**Page 1-2 (between "2021-02-01T19:18:14.132-06:00" and "2021-02-01T19:18:23.899-06:00"; between "did you hear that on" and "No I actually use Android,"; and between "10pm on" and "with elon musk.")**	Google (Cramer Decl. ¶ 51)	
Exhibit A24 – Joint Proffer – Exhibit 35 [Dkt. No. 257-35]	**Page 1 (between "Liderman [" and "]"; and between "Kleidermacher [" and end of "To:" line)**	Google (Cramer Decl. ¶ 52)	
Exhibit A24 –	**Page 1 (between "been considered" and "Eugene Liderman, 2020-09-29**	Google (Cramer Decl. ¶ 53)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Joint Proffer – Exhibit 35 [Dkt. No. 257-35]	08:04:23"; between "08:08:07" and "should we continue"; between "off-play risk has" and "Dave Kleidermacher, 2020-09-29 08:09:35"; and between "with an MTD represent" and "of all AE devices")		
Exhibit A25 – Joint Proffer – Exhibit 36 [Dkt. No. 257-36]	Page 1 (between "Izmit [" and "]"; and between "Bankhead [" and end of "To:" line)	Google (Cramer Decl. ¶ 54)	
Plaintiffs' Motion for Sanctions			
Exhibit B – Plaintiffs' Motion for Sanctions [Dkt. No. 349]	Page 3, lines 10-11 (between "including" and ", about relevant matters")	Google (Cramer Decl. ¶ 55)	
Exhibit B – Plaintiffs' Motion for Sanctions [Dkt. No. 349]	Page 9, lines 9-14 (between "popular apps" and ", YouTube)"; between "warns" and "Engineering"; and between "that" and end of sentence)	Google (Cramer Decl. ¶ 56)	
Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 4, fourth section (between beginning of bolded header and "Contracts"; between "agreements between" and ", because the individuals"; between "responsible for negotiating the" and "are custodians in either"; between "relating to" and "agreements that were collected"; and between "agreements between" and ". Google also reserves")	Google (Cramer Decl. ¶ 57)	
Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 4, heading 5 (from beginning of heading to "Agreement")	Google (Cramer Decl. ¶ 58)	
Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 5 (from "example of an email referencing a" to "NDA")	Google (Cramer Decl. ¶ 59)	
Exhibit B1 – Plaintiffs' Motion for Sanctions –	Page 6, para. 4 (between "signing party for" and "agreements is"; between	Google (Cramer Decl. ¶ 60)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit 1 [Dkt. No. 349-2]	"agreements is" and end of sentence; and between "has been produced for" and end of sentence)		
Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Page 7, paragraph 1 (between "(1)" and "(GOOG-"; between "(2)" and "(GOOG-"; between "(3)" and "(GOOG-"; and between "(4)" and "(GOOG-")	Google (Cramer Decl. ¶ 61)	
Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Ex. 01-C, Entire Table	Google (Cramer Decl. ¶ 62)	
Exhibit B1 – Plaintiffs' Motion for Sanctions – Exhibit 1 [Dkt. No. 349-2]	Ex. 01-D, Entire Table	Google (Cramer Decl. ¶ 63)	
Exhibit B2 – Plaintiffs' Motion for Sanctions – Exhibit 3 [Dkt. No. 349-2]	Page 128, lines 8-10 (between "Play Store that" and "rev share on the Play Store"), and lines 20-21 (between "chat yesterday that" and "on the Play Store")	Google (Cramer Decl. ¶ 64)	
Exhibit B2 – Plaintiffs' Motion for Sanctions – Exhibit 3 [Dkt. No. 349-2]	Page 129, lines 17-23 (between "says that" and end of sentence; between "that means that" and "in return for"; and between "in return for" and "is that what that means?")	Google (Cramer Decl. ¶ 65)	
Exhibit B3 – Plaintiffs' Motion for Sanctions – Exhibit 6 [Dkt. No. 349-2]	Page 11, lines 12-20 (between "Q" and end of sentence ending at line 20)	Google (Cramer Decl. ¶ 66)	
Exhibit B4 – Plaintiffs' Motion for Sanctions – Exhibit 7 [Dkt. No. 349-2]	Page 1 (between "Herring [" and "]"; and between "Cramer [" and end of "To:" line)	Google (Cramer Decl. ¶ 67)	
Exhibit B4 – Plaintiffs' Motion for Sanctions – Exhibit 7 [Dkt. No. 349-2]	Page 1 (between "in Q2 alone" and "see earnings prep")	Google (Cramer Decl. ¶ 68)	

[PROPOSED] ORDER RE: JOINT OMNIBUS MOTION TO FILE UNDER SEAL

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit B4 – Plaintiffs' Motion for Sanctions – Exhibit 7 [Dkt. No. 349-2]	Page 2 (between "in this chart" and end of sentence; and between "but this is the number from BC and" and end of sentence)	Google (Cramer Decl. ¶ 69)	
Exhibit B5 – Plaintiffs' Motion for Sanctions – Exhibit 8 [Dkt. No. 349-2]	Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	Google (Cramer Decl. ¶ 70)	
Exhibit B6 – Plaintiffs' Motion for Sanctions – Exhibit 9 [Dkt. No. 349-2]	Page 1 (between "Izmit [" and "]"; and between "Bankhead [" and end of "To:" line)	Google (Cramer Decl. ¶ 71)	
Exhibit B7 – Plaintiffs' Motion for Sanctions – Exhibit 10 [Dkt. No. 349-2]	Page 1 (between "Pimplapure [" and "]"; and between "Song [" and end of "To:" line)	Google (Cramer Decl. ¶ 72)	
Exhibit B8 – Plaintiffs' Motion for Sanctions – Exhibit 12 [Dkt. No. 349-2]	Page 1 (between "Liderman [" and "]"; and between "Kleidermacher [" and "]")	Google (Cramer Decl. ¶ 73)	
Exhibit B8 – Plaintiffs' Motion for Sanctions – Exhibit 12 [Dkt. No. 349-2]	Page 1 (between "been considered" and "Eugene Liderman, 2020-09-29 08:04:23"; between "08:08:07" and "should we continue"; between "off-play risk has" and "Dave Kleidermacher, 2020-09-29 08:09:35"; and between "with an MTD represent" and "of all AE devices")	Google (Cramer Decl. ¶ 74)	
Exhibit B9 – Plaintiffs' Motion for Sanctions – Exhibit 13 [Dkt. No. 349-2]	Page 1 (between "Chu [" and end of "From:" line; between "To:" and end of line)	Google (Cramer Decl. ¶ 75)	
Exhibit B9 – Plaintiffs' Motion for Sanctions – Exhibit 13 [Dkt. No. 349-2]	Page 2 (between "12:24:38" and end of message; between "12:24:49" and end of message; between "13:34:23" and end of message; and between "13:34:40" and end of message)	Google (Cramer Decl. ¶ 76)	

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit B10 – Plaintiffs' Motion for Sanctions – Exhibit 14 [Dkt. No. 349-2]	Page 1 (between "Lim [" and end of "From:" line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)	Google (Cramer Decl. ¶ 77)	
Exhibit B10 – Plaintiffs' Motion for Sanctions – Exhibit 14 [Dkt. No. 349-2]	Page 1 (between "reflect the" and "convo we just had"; between "engage with" and " "; between "to your proposal" and "for reference, I think this"; between "made it unclear if" and " "; between "what this means for" and end of sentence; between "the intent is that" and end of sentence; and between "4." and end of sentence)	Google (Cramer Decl. ¶ 78)	
Exhibit B10 – Plaintiffs' Motion for Sanctions – Exhibit 14 [Dkt. No. 349-2]	Page 1 (between "lgtm. With one caveat" and end of following sentence)	Google (Cramer Decl. ¶ 79)	
Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 1 (between "Schaengold [:" and end of line; between "To:" and end of line)	Google (Cramer Decl. ¶ 80)	
Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 2 (between "directly to reflect the details of" and end of message; between "images of the" and "flow?"; between "we should include" and end of message; between "17:02:00" and "<ahref="; between "Thanks for pointing that out, Christina" and end of message; and between "18:01:03" and end of message)	Google (Cramer Decl. ¶ 81)	
Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	Page 3 (between "18:03:55" and end of message at end of page)	Google (Cramer Decl. ¶ 82)	
Exhibit B11 – Plaintiffs' Motion for Sanctions –	Page 4 (between "18:08:13" and Mrinalini Loew, 2021-05-26 18:11:38")	Google (Cramer Decl. ¶ 83)	

C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit 15 [Dkt. No. 349-2]			
Exhibit B11 – Plaintiffs' Motion for Sanctions – Exhibit 15 [Dkt. No. 349-2]	**Pages 4-5 (between "18:13:03" and "18:23:48")**	Google (Cramer Decl. ¶ 84)	
Exhibit B12 – Plaintiffs' Motion for Sanctions – Exhibit 16 [Dkt. No. 349-2]	**Page 1 (between "Mahbod [:" and end of line; between "To:" and end of line)**	Google (Cramer Decl. ¶ 85)	
Exhibit B12 – Plaintiffs' Motion for Sanctions – Exhibit 16 [Dkt. No. 349-2]	**Page 1 (between "08:48:37" and end of message beginning "08:48:39")**	Google (Cramer Decl. ¶ 86)	
Exhibit B13 – Plaintiffs' Motion for Sanctions – Exhibit 17 [Dkt. No. 349-2]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and, for each message on page, between bullet point and start of timestamp)**	Google (Cramer Decl. ¶ 87)	
Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	**Page 3 (between "Agreement with" and end of heading; between "We understand that the" and end of sentence; and between "do not understand how" and "avoidance of lodging")**	Google (Cramer Decl. ¶ 88)	
Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	**Page 6 (between "As for agreements with" and ", as discussed"; between "meet and confer," and "Plaintiffs previously"; between "does it appear that" and "is a part of any"; between "the issue of" and "agreements, claiming that public news reports"; between "exist relevant agreements with" and "yet Plaintiffs"; and between "relating to advertising" and end of sentence)**	Google (Cramer Decl. ¶ 89)	
Exhibit B14 – Plaintiffs' Motion for Sanctions –	**Page 6 (between "Agreement related to" and end of heading; between "its agreement with"**	Google (Cramer Decl. ¶ 90)	

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C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit 19 [Dkt. No. 349-2]	and "is irrelevant and simply"; between "working through these issues with" and end of sentence; and between "work through the specific with" and "regarding this potential compromise")		
Exhibit B14 – Plaintiffs' Motion for Sanctions – Exhibit 19 [Dkt. No. 349-2]	Page 6 (between "relevant communications with Apple," and end of following sentence; and between "communications related to" and end of sentence)	Google (Cramer Decl. ¶ 91)	
Exhibit B15 – Plaintiffs' Motion for Sanctions – Exhibit 20 [Dkt. No. 349-2]	Page 1 (between "Yang [" and "]"; and between "Riphagen [" and end of "To:" list)	Google (Cramer Decl. ¶ 92)	
Exhibit B16 – Plaintiffs' Motion for Sanctions – Exhibit 21 [Dkt. No. 349-2]	Page 1 (between "Chu [" and "]"; and between "Kim [" and end of "To:" list)	Google (Cramer Decl. ¶ 93)	
Exhibit B16 – Plaintiffs' Motion for Sanctions – Exhibit 21 [Dkt. No. 349-2]	Pages 3-5 (between "has been asked by" and "We told them this is different"; between "asked to present" and "next Friday"; between "will be presenting" and end of sentence; and between "something before next friday" and "etc.")	Google (Cramer Decl. ¶ 94)	
Plaintiffs' Reply			
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 1 (between "declines" and "what is/is not")	Google (Cramer Decl. ¶ 95)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 3 (between "comp" and "Jan1")	Google (Cramer Decl. ¶ 96)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 4 (between "what (any) plan might look like" and "4. other random"; and between "feedback/notes" and "ok, etc?")	Google (Cramer Decl. ¶ 97)	
Exhibit C – Plaintiffs' Reply	Page 7 (between "pb" and "runway")	Google (Cramer Decl. ¶ 98)	

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Exhibit 22 [Dkt. 372-3]			
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 11 (between "billions at risk" and "https://docs.google.com/")	Google (Cramer Decl. ¶ 99)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 7 (between "jamie" and end of page).	Google (Cramer Decl. ¶ 100)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 13 (between "clover" and "store process.").	Google (Cramer Decl. ¶ 101)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 13 (between "step back" and "as a vector")	Google (Cramer Decl. ¶ 102)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 14 (between "team off" and "carousel")	Google (Cramer Decl. ¶ 103)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 15 (between "and then . . . " and end of page)	Google (Cramer Decl. ¶ 104)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 16 (between "what to combine" and "sameer")	Google (Cramer Decl. ¶ 105)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 17-18 (between "2/8" and "2/9")	Google (Cramer Decl. ¶ 106)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 20-21 (between "gmscore" and "timeline")	Google (Cramer Decl. ¶ 107)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 22 (between top of page and "policy, etc}"; and between "2:40PM" and end of message)	Google (Cramer Decl. ¶ 108)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 23-24 (between "2:41 PM," on page 23, and "2:55 PM," on page 25)	Google (Cramer Decl. ¶ 109)	

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C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 27 (between "for october" and "negotiations there"; and between "few things" and end of page)	Google (Cramer Decl. ¶ 110)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 28 (between "5:32 PM" and "without a hedge")	Google (Cramer Decl. ¶ 111)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 29 (between top of page and "abuse")	Google (Cramer Decl. ¶ 112)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 30 (between "2:23pm" and "our policies")	Google (Cramer Decl. ¶ 113)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 32 (between "up slightly" and "4 min"; and between "April)" and "1 min.")	Google (Cramer Decl. ¶ 114)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 32 (between "achieve the most" and end of page)	Google (Cramer Decl. ¶ 115)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33 (between top of page and "world changing")	Google (Cramer Decl. ¶ 116)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33 (between changing course?" and "talks to")	Google (Cramer Decl. ¶ 117)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33 (between "talks to" and "1) get clarity")	Google (Cramer Decl. ¶ 118)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 33-36 (between "analytics available" and end of page 36)	Google (Cramer Decl. ¶ 119)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	Page 37 (between "met w" and "behind on")	Google (Cramer Decl. ¶ 120)	
Exhibit C – Plaintiffs' Reply	Page 37 (between "taking orders" and "GKS")	Google (Cramer Decl. ¶ 121)	

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C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit 22 [Dkt. 372-3]			
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 41 (between "do with the data" and "DEI")**	Google (Cramer Decl. ¶ 122)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 41-42 (between "how this started" and "slack, etc.")**	Google (Cramer Decl. ¶ 123)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 42 (between "search" and end of page)**	Google (Cramer Decl. ¶ 124)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 43 (between "team leadership" and "DEI"; and between "startup" and "qb for")**	Google (Cramer Decl. ¶ 125)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 43 (between "as we converged" and "real money"; and between "advisor to" and "lootdrops")**	Google (Cramer Decl. ¶ 126)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 45 (between "return to office" and "subs platform")**	Google (Cramer Decl. ¶ 127)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 46-49 (between "use facing" and "NATIVE")**	Google (Cramer Decl. ¶ 128)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 49-50 (between "NATIVE" and "???")**	Google (Cramer Decl. ¶ 129)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 52 (between "economics?" and "role")**	Google (Cramer Decl. ¶ 130)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 53 (between "entertainment" and "rest of app")**	Google (Cramer Decl. ¶ 131)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 54 (between "product objectives" and "misinformation")**	Google (Cramer Decl. ¶ 132)	

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C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 54 (between "zoom in here?" and "NATIVE")**	Google (Cramer Decl. ¶ 133)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 54-55 (between "NATIVE" and "pps summaries")**	Google (Cramer Decl. ¶ 134)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 55 (between "free2paid" and "dev console")**	Google (Cramer Decl. ¶ 135)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 58-59 (between "not on slide" and "[HEARING]")**	Google (Cramer Decl. ¶ 136)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 62 (between "play cuts" and "quarterly")**	Google (Cramer Decl. ¶ 137)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 67 (between "23 min" and end of message)**	Google (Cramer Decl. ¶ 138)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 70 (between "hc ask," and "transactional")**	Google (Cramer Decl. ¶ 139)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 70 (between " - sundar -" and "unclear plan")**	Google (Cramer Decl. ¶ 140)	
Exhibit C – Plaintiffs' Reply Exhibit 22 [Dkt. 372-3]	**Page 71 (between "YT" and "r&r")**	Google (Cramer Decl. ¶ 141)	
Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	**Page 73, line 1 to Page 74, line 11 (from start of line 1 to end of line 11)**	Google (Cramer Decl. ¶ 142)	
Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	**Page 75, lines 2-5 (from "Q" to end of sentence ending on line 5)**	Google (Cramer Decl. ¶ 143)	

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C. Cramer Decl. Exhibit	Portion Containing Designated Information	Designating Party	Ruling
Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	**Page 75, lines 13-21 (from "Q" to end of sentence ending on line 21)**	Google (Cramer Decl. ¶ 144)	
Exhibit C1 – Plaintiffs' Reply Exhibit 24 [Dkt. 372-5]	**Page 76, line 11 to Page 77, line 6 (from "A" to end of sentence ending on Page 77, line 6)**	Google (Cramer Decl. ¶ 145)	
Exhibit C2 – Plaintiffs' Reply Exhibit 25 [Dkt. 372-6]	**Page 1 (between "Herring [" and "]"; and between "Porat [" and end of "To:" line).**	Google (Cramer Decl. ¶ 146)	
Exhibit C2 – Plaintiffs' Reply Exhibit 25 [Dkt. 372-6]	**Page 1 (between 11:06:49 and end of message; between 11:07:50 and "Ruth Porat, 2019-06-20 11:12:49"; and between "materializing" and "Ruth Porat, 2019-06-20 11:15:00")**	Google (Cramer Decl. ¶ 147)	
Exhibit C3 – Plaintiffs' Reply Exhibit 26 [Dkt. 372-7]	**Page 1 (between "From:" and end of line; between "To:" and end of line; and between "Subject:" and end of line).**	Google (Cramer Decl. ¶ 148)	
Exhibit C3 – Plaintiffs' Reply Exhibit 26 [Dkt. 372-7]	**Page 1 (between "you are making headlines" and "The same thing happened with Java")**	Google (Cramer Decl. ¶ 149)	
Exhibit C3 – Plaintiffs' Reply Exhibit 26 [Dkt. 372-7]	**Page 2 (between "me" and "would work, too.")**	Google (Cramer Decl. ¶ 150)	

Dated: _____, 2023

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Honorable James Donato
United States District Judge
Northern District of California